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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISO DIVISION

13 ANTHONY D. MARSHALL,

Case No. 3:18-cv-03586-CRB

14 Plaintiff,

15 v.
16 NOTICE OF SETTLEMENT,
17 Defendant. STIPULATION TO DISMISS AND
18 [PROPOSED] ORDER OF DISMISSAL

19
20 UNITED STATES OF AMERICA,
21 Defendant.

22 Plaintiff and Defendant, through the undersigned counsel, advise the Court that this matter is
23 settled and that it will take between sixty and ninety days to execute the settlement terms.

24 1. Accordingly, the parties stipulate that this action be dismissed with prejudice, each party
25 to bear its own costs and attorney's fees.

26 2. The parties further stipulate that if a party certifies to this Court, with proof of service on
27 opposing counsel, within ninety days from the date of the Order of Dismissal, that any settlement term
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28 Case No. 3:18-cv-03586-CRB
Request For Dismissal & [proposed] Order
of Dismissal

1 was not performed, the Order of Dismissal shall be vacated, and a case management conference be
2 scheduled.

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6 FRAMTA SAECHAO
7 Law Offices of Robert Goldstein
8 Attorney for Plaintiff

Respectfully submitted,
DAVID L. ANDERSON
United States Attorney

/s/ Cynthia Stier
CYNTHIA STIER
Assistant United States Attorney
Tax Division
Attorneys for the United States of America

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11 ORDER OF DISMISSAL

12 For the reasons set forth above, it is hereby ORDERED, ADJUDGED and DECREED that this
13 action is dismissed pursuant to Rule 41(a)(1)(A)(ii) of the Fed.R.Civ.Pro., each party to bear its own
14 costs, including attorney fees.

15 Dated: February 12, 2019

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17 HONORABLE CHARLES R. BREYER
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UNITED STATES DISTRICT JUDGE